

# Defensive Driving Schools Update

# AOC's Interest

Public/Students

Diversion of Individuals from Court

Reduce Accidents and Driving Violations

Provide Students with Professional Product

# AOC's Interest (continued)

## Public/Students Concerns

- Convenience while Contacting Schools and Selecting and Attending Class
- Ability to make Informed Choice Regarding Cost
- Convenience in Logistic Matters (date, time, location and language)
- Quality of the Course Curriculum and the Presentation



# Since Last Meeting

AOC has

- Conducted a Student Survey
- Reviewed Florida, California and Michigan Driving Programs
- Conducted a Telephone Answering Survey of Schools
- Reviewed Interested Party Proposals

# Student Survey - Statistics

- 2,981 Students Surveyed (Participated in Defensive Driving Course during March 2017)
- 338 Students Responded (11.3%)
- On a Five Point Scale, Five being Most Important:
  - Language - 4.74
  - Distance - 4.74
  - Day of the Week - 4.73
  - Time of Class - 4.71
  - Date of the Class - 4.69
  - Cost of the Class - 4.35

# Student Survey - Written Comments

Approximately 60% of Those Responding Provided Written Comments:

- Comments were Generally Positive
- Students Felt They Learned Something
- Some Students Felt the Course Content was Dated
- Some Students Felt the Online Test Should be Substance Based
- Very Small Number of Students Complained about Number of Schools



# School Telephone Survey

AOC Staff Performed Telephone Survey of 30 Schools (15 Online 15 Classroom) - Once a Day for Three Consecutive Days:

- 17 Schools (57%) Answered the Telephone Each Time
- 13 Schools (43%) Did Not Answer the Telephone at Least Once
- 5 Schools (17%) Never Answered the Telephone

# Interested Party Proposals

## Owners' Proposals Addressed Two Main Issues:

- Webpage Enhancements
- Appropriateness of Owners being Allowed to DBA with Multiple Names



# Owners' Proposals - Webpage Enhancements

- Modify Web Page to Require Student to First Select Live or Online Class
- Require Student Search by Location

# AOC Proposal to AJC - Webpage Enhancements

## AOC's Proposal to AJC:

- Allow Student to Initially Select the Type of Class (Live or Online)
- Allow Student to Initially Select English or Spanish
- If Live Class Selected, Allow Student to Sort by Class Location, Date and Time
- Allow Students to Sort by Cost
- Require Schools to Populate an AOC Database with Class Location, Date and Time Information to Automatically Update AOC Webpage

# Owners' Proposals - DBAs Multiple Schools

## DBA - Multiple Schools Inappropriate

### Why

- Consumer Confusion
- Unfair Competition
- Website Structure Lends Itself to Use as Advertising Platform

### Solution

- One Owner One School



# Owners' Proposals - DBAs Multiple Schools

## DBA - Multiple Schools Appropriate

### Why

- Activity is ACJA Appropriate
- Owners Invested to Grow Business
- Competition has Lowered Cost to the Student
- Competition has Created Higher Quality Program

### Solution

- No Changes Necessary

# AOC's Proposal to AJC - DBAs Multiple Schools

- Website for Consumer Assistance, Not Market Share
- Students' Interest is in Quality Course not School Ownership
- To be listed on website, a School's Curriculum/Course Presentation must be *Substantially* Different from other programs owned by same owner.
- No Limit on the Number of Schools an Individual May Own
- No Inappropriate Class Cancellation or Student Referral Practices



# Substantially Different

Owner must Identify How Curriculum/Presentation is Substantially Different from all Other Schools:

- Different Course Format
- Different Course Wording
- Different Course Online Test
- Different Course Videos or Slides

Reasonable Person Would not Assume Courses Provided by the Same Owner



# AOC's Proposal to AJC - Curriculum

- AOC Undertake a Study of Current Curriculum Requirements
- Amend ACJA to Update and Improve Curriculum Requirements

# AOC's Proposal to AJC - Summary

- Update Website to Assist Students when Selecting School
- Eliminate DBA's Utilizing the Same Curriculum
- Update and Improve Curriculum

# AOC - The Future

## Amend Code to Improve School Performance and Course Quality:

- Schools to Provide More Informative and Engaging Classes
- Schools to Improve Service to Students - Answering Telephones
- Improve Websites to Provide Students a Better Understanding of Course Presentation and Cost Prior to School/Class Selection
- Schools to Improve Student Registration Process
- Eliminate the Requirement that Online Schools have a Licensed Instructor



# Implementation

- Board Presentation May 25, 2017
- AJC Presentation June 19, 2017
- Request an ACJA Amendment to place Schools on a One Year Renewal Cycle to Allow Implementation
- ACJA Amendments to be Complete by October 31, 2018

End

# Other States

- California
- Florida
- Michigan



# California

- No Limit on the Number of Schools
- No Limit on Listing on the Webpage
- DBAs Permitted
- Each School Must Have its Own Place of Business and be Open to the Public

# Michigan

- Not Diversion Program
- Pay Ticket and Can Take Class to Have the Points Removed from Record
- Consumer May Only Participate in the Program Once
- Must Meet Curriculum Standard or have Effectiveness Study

# Florida

- Website Lists Course Providers Only (Curriculum Owner)
- Extensive Approval Process
- Two Year Probation Period with Limited Geographic Location
- No Mechanism to Alert Consumer if School is Using Appropriate Curriculum